

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2012

Docket No. N2012-1

INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO
TO USPS WITNESS MICHAEL D. BRADLEY
(APWU/USPS-T10-1-5)
(January 19, 2012)

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories to United States Postal Service witness Michael D. Bradley (USPS-T-10). If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness David E. Williams (APWU/USPS-T1-1-4), filed on December 22, 2011, and are hereby incorporated by reference.

Respectfully submitted,

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Jennifer L. Wood
Counsel for American Postal Workers Union, AFL-CIO

APWU/USPS-T10-1 Table 16 summarizes the \$2.6 billion in annual savings that the Postal Service expects to gain from this initiative.

- a) Please confirm that almost 40 percent of those savings (\$964 million) come from your calculation of productivity gains from mail processing labor.
- b) Please confirm that the productivity savings are valued at FY2010 labor rates.
- c) Please confirm that this valuation of mail processing labor savings does not incorporate the labor flexibilities that were agreed to in the APWU 2010 contract.

APWU/USPS-T10-2 Mr. Neri describes the productivity opportunities as “gained through balancing of the processing profile” and elimination of redundant processes as the number of facilities is reduced. Would you agree that:

- a) Your estimates of productivity gains are dependent on the removal of all mail processing operations from all of the locations scheduled for review?
- b) Your estimates of productivity gains are dependent on the lengthening of processing windows at all the remaining facilities in order to balance the processing profile?

APWU/USPS-T10-3 You state that the productivity gains “are largest in the automated letter operations, which are most subject to service standard constraints, and smallest in manual operations, where the longer operating windows do not generate as much productivity gain.” To what extent are manual operations determined by the existence of mail pieces that must meet their service standards but have missed their processing window (especially for DPS)?

APWU/USPS-T10-4 In calculating net labor savings, do you incorporate frictional costs that result from displaced labor being redeployed to jobs that are below their current skill and training levels?

APWU/USPS-T10-5 You are estimating productivity savings using factors estimated by Mr. Neri. How would these productivity savings be captured in the Handbook PO 408 AMP process?